

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA

IN RE:  MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,  Debtors.	Chapter 11 Bankruptcy Case No. 23-00623  <b>THIRD CONSENT MOTION TO EXTEND TIME (re Admin Claim #40013)</b>
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COMES NOW Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust, and in support of this Motion respectfully states:

1. The Official Committee of Mercy Pensioners filed with Epiq (the Claims Agent) Administrative Claim #40013, in the amount of \$1,467,741.94. The Administrative Claim was filed pursuant to a previous Order issued by this Court, setting forth the procedure for timely filing of Administrative Claims.

2. Pursuant to consent and stipulation and entry by this Court of Consent Orders, the current deadline for the Trustee to object to Administrative Claims is January 27, 2025.

3. The Trustee and his counsel as well as Claimant's counsel need more time to examine and evaluate and to discuss possible resolution as to allowance of Administrative Claim #40013.

4. The Trustee via counsel has consulted with the claimant who signed the Administrative Claim, and the claimant's counsel consents to the Trustee's request for an additional approximately thirty days to object to Administrative Claim #40013.

5. Good cause therefore exists to extend the deadline for the Trustee to object to Administrative Claim #40013 to and including February 28, 2025.

WHEREFORE, the Liquidation Trustee respectfully prays this Court enter and enroll an Order granting the Liquidation Trustee, and only the Liquidation Trustee, through and including February 28, 2025, to object to Administrative Claim #40013, and for such other relief as may be just and proper under the premises.

/s/ Eric W. Lam  
Eric W. Lam, AT0004416  
SIMMONS PERRINE MOYER BERGMAN PLC  
115 Third Street SE, Suite 1200  
Cedar Rapids, IA 52401  
Tel: 319-366-7641; Fax: 319-366-1917  
[elam@simmonsperrine.com](mailto:elam@simmonsperrine.com)

ATTORNEY FOR LIQUIDATION TRUSTEE

**Certificate of Service**

The undersigned certifies, under penalty of perjury, that on this 19<sup>th</sup> day of January 2025, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ E. Lam

MHLT/Pldgs/BA 23-00623 – Drafts/Mtn to Extend Time to Obj to Admin Claim #40013.011925.1654.ewl